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August 8, 2022

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: McGlynn v. Insider Media Group, 1:22-cv-02537 (JMF)

Dear Judge Furman:

We represent Plaintiff David McGlynn in the above-captioned case. We write pursuant to section 1.F of the Court's Individual Rules and Practices to respectfully request a 30-day extension of time, through September 12, 2022, to file a Notice of Dismissal (or otherwise re-open the case).

- 1) the original deadline is August 13, 2022 [Dkt. No. 13];
- 2) no previous requests for an extension of time have been sought;
- 3) no previous requests for an extension have been granted or denied;
- 4) despite the parties' best efforts, the settlement transaction will not be consummated by the original deadline and, accordingly, the parties jointly request a 30-day extension. The parties understand that the Court's Order of Dismissal states that requests to extend the deadline are unlikely to be granted; however, the parties are respectfully requesting a one-time extension and are confident that no further requests will be needed.
- 5) Defendant Insider Media Group consents to the requested relief;
- 6) No other dates will be impacted as all pending conferences have been cancelled.

Application GRANTED. The Clerk of Court is
directed to terminate ECF No. 15. SO ORDERED.

A handwritten signature in black ink, appearing to read 'James H. Freeman'. Below the signature, the date 'August 8, 2022' is written in blue ink.

August 8, 2022

Respectfully Submitted,

s/**jameshfreeman**/
James H. Freeman

Counsel for Plaintiff



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